

No. 3:15-cr-00037-2  
IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

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**UNITED STATES OF AMERICA,**

*Plaintiff,*

v.

**BENJAMIN BRADLEY,**

*Defendant.*

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**MOTION TO SUPPLEMENT ELECTRONIC RECORD FOR PURPOSES OF APPEAL**

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Defendant Benjamin Bradley respectfully moves this Court to enter an order making the attached documents part of the electronic record in this case for purposes of appeal. The documents were all introduced into evidence as exhibits at Bradley's forfeiture hearing, held on May 24, 2019. Bradley's case is now before the U.S. Court of Appeals for the Sixth Circuit. Undersigned counsel has received scanned, electronic copies of the paper exhibits from the Clerk of this Court upon the request of the government's counsel. Bradley now moves to make scanned copies of the paper exhibits part of the electronic record, so that the parties and the court of appeals may refer to them in the pending appeal. Undersigned counsel has corresponded with the government's counsel, who has no objection to this motion.

The attached documents are as follows. They are in the same order and have the same description as the Court's Exhibit and Witness List, (Dkt. No. 1182, PageID# 4724), with the exception of Attachment 11, which was mislabeled on the Court's Exhibit and Witness List as "Defendant's property transfer affidavit for 45669 Harmony Lane"—it should have instead been

listed as “Defendant’s 2014 tax return.” The exhibits have been redacted as required by the Sixth Circuit Guide to Electronic Filing, Rule 12.

<b>Attachment No.</b>	<b>Exhibit No.</b>	<b>Description</b>
1	Gov’t Ex. 1b	Line sheets of telephone calls
2	Gov’t Ex. 2a	Deed transfer of 45669 Harmony Lane, Belleville, MI 48111
3	Gov’t Ex. 3a	Krikor Holding LLC, showing sale of 45669 Harmony Lane property
4	Gov’t Ex. 4a	Defendant’s property transfer affidavit for 45669 Harmony Lane
5	Gov’t Ex. 5a	Quit Claim Deed for 45669 Harmony Lane property
6	Def. Ex. 1a	Defendant’s 2010 tax return
7	Def. Ex. 2a	Defendant’s 2011 tax return
8	Def. Ex. 3a	Defendant’s 2012 tax return
9	Def. Ex. 4a	Form listing defendant’s sale of 11 properties in 2013
10	Def. Ex. 5a	Defendant’s 2013 tax return
11	Def. Ex. 6a	Defendant’s 2014 tax return
12	Def. Ex. 7a1	Bank statements for co-defendant Buchanan (Acct # *1061)
13	Def. Ex. 7a2	Bank statements for co-defendant Buchanan (Acct # *2517)
14	Def. Ex. 7a3	Bank statements for co-defendant Buchanan (Acct # *1079)

Respectfully submitted,

*/s/ Melissa M. Salinas*  
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*Counsel for Benjamin Bradley*

**CERTIFICATE OF SERVICE**

I hereby certify that this motion was filed on November 21, 2019, using the Court's ECF system, which will send notice of this filing to all counsel of record indicated on the electronic receipt.

/s/ Melissa M. Salinas  
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